IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA EASTERN-WATERLOO DIVISION

| UNITED STATES OF AMERICA, |) No. CR 10-2030 |
|---------------------------|---------------------------------|
| Plaintiff, |) Count 1 |
| |) 26 U.S.C. § 7206(2) |
| vs. |) Assisting the Filing of False |
| |) Tax Return |
| YOSHIDA L. FORD, |) |
| |) Count 2 |
| Defendant. | , 26 U.S.C. § 7206(1) |
| |) Filing a False Tax Return |

INFORMATION

The United States Attorney charges:

Count 1

On or about January 28, 2008, in the Northern District of Iowa, defendant Yoshida L. Ford, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service of a U.S. Individual Income Tax Return, Form 1040, of M.N. for the calendar year 2007. The return was false and fraudulent as to a material matter, in that it falsely stated M.N. earned \$9,495 in wages, salaries, and tips during calendar year 2007. As defendant Yoshida L. Ford then and there knew and believed, that substantially and materially overstated M.N.'s income during calendar year 2007. Through this false statement, defendant Yoshida L. Ford increased the payment M.N. received under the Earned Income Credit.

This was in violation of Title 26, United States Code, Section 7206(2).

Count 2

On or about January 16, 2009, in the Northern District of Iowa, defendant Yoshida L. Ford, a resident of Waterloo, Iowa, did willfully make and subscribe a U.S.

Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That U.S. Individual Income Tax Return, Form 1040, which was prepared and signed in the Northern District of Iowa and was filed with the Internal Revenue Service, falsely stated that defendant Yoshida L. Ford earned \$12,329 in wages, salaries, and tips during calendar year 2008. As defendant Yoshida L. Ford then and there knew and believed, that substantially and materially overstated her income during calendar year 2008. Through this false statement, defendant Yoshida L. Ford increased the payment she received under the Earned Income Credit.

This was in violation of Title 26, United States Code, Section 7206(1).

STEPHANIE M. ROSE United States Attorney

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REBECCA GOODGAME EBINGER

Assistant United States Attorney